

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

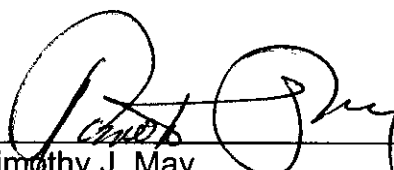
Docket No. R2000-1

**RESPONSE OF PARCEL SHIPPERS ASSOCIATION
WITNESS LLOYD KARLS TO INTERROGATORIES OF
UNITED STATES POSTAL SERVICE
(USPS/PSA-T-2-1-4)**

Parcel Shippers Association hereby provides the responses of witness Lloyd Karls to the following interrogatories of United States Postal Service: USPS/PSA-T-2-1-4, filed on May 31, 2000.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,



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Dated: June 19, 2000

**RESPONSE OF PARCEL SHIPPERS ASSOCIATION WITNESS KARLS
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE**

USPS/PSA-T2-1. The following questions refer to the methodology used to derive the average cube of Fingerhut's oversize parcels (6.03).

- a. Was a sample used to calculate this average cube? If yes, please explain what methodology you used to ensure the randomness of the sample.
- b. Over what period of time was the average cube of 6.03 calculated?
- c. Exactly how was cube calculated? Was each parcel measured individually? Please explain all steps in the process including any assumptions that were used.
- d. Please supply all the raw data used to calculate the average cube of 6.03.

RESPONSE:

- a. No.
- b. Average cube was calculated on packages shipped during the December 26, 1998 – December 31, 1999 timeframe.
- c. The package cube was calculated by multiplying the package length in inches by the width in inches by the height in inches divided by 1,728. The result is the cubic size in feet of the package.

No.

One unit of each product code is measured during the receiving process.

Each receiving requires a new measurement.
- d. Please see attached detail used to calculate the average Fingerhut cube of 6.03.

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USPS/PSA-T2-2. The following questions refer to the methodology used to derive the average cube of CTC's oversize parcels (5.6).

- a. Was a sample used to calculate this average cube? If yes, please explain what methodology you used to ensure the randomness of the sample.
- b. Over what period of time was the average cube of 5.6 calculated?
- c. Exactly how was cube calculated? Was each parcel measured individually? Please explain all steps in the process including any assumptions that were used.
- d. Please supply all the raw data used to calculate the average cube of 5.6.

RESPONSE:

- a. Yes. CTC corporate staff asked its Operating Centers to take a "snapshot" of all the oversize parcels in-house on May 16, 1999. Each of the sixteen Operating Centers took measurements of all the oversize (108 inches – 130 inches) packages they handled that day.
- b. The period was one day (May 16, 1999).
- c. Each parcel was measured individually (length plus girth). Yes, each parcel was measured individually. There were no assumptions used.
- d. The raw data used to calculate the CTC average cube of 5.6 follows:

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USPS/PSA-T2-3. Do you have any data on the average oversize cube of other mailers besides Fingerhut and CTC? If so, please provide those data.

RESPONSE:

No.

USPS/PSA-T2-4. Please present the data in PSA Exhibit T2-1 (described in the testimony as "Exhibit A") by weight increment. Also, please provide the CTC data referred to in your testimony by weight increment. If this is not available, please provide the number of 108-130 inch length plus girth pieces weighing under 70 pounds and the number of 108-130 length plus girth pieces weighing over 70 pounds for both your data and the CTC data.

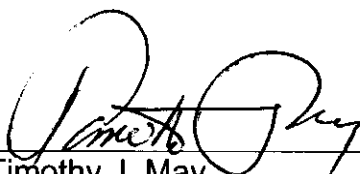
RESPONSE:

For Fingerhut, see response to T2-1(d).

For CTC, weight level detail, although captured at the time, was not kept for this sample. However, it is known that all packages weighed less than 70 pounds.

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the Postal Service by hand and by First-Class Mail upon all participants in this proceeding requesting such service.



Timothy J. May

Dated: June 19, 2000